

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BOLDT  
TO VALPAK INTERROGATORIES VP/USPS-T1-5,6, 8 AND 11**

The United States Postal Service hereby provides the responses of witness Boldt to the above-listed interrogatories of the Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. dated August 30, 2011. Each interrogatory is stated verbatim and followed by the response. VP/USPS-T1-1 through 3, 7 and 9 have been redirected to the Postal Service for institutional responses that are being filed today. Responses to VP/USPS-T1-14, 10 and 12 are forthcoming

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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September 13, 2011

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT  
TO INTERROGATORY OF VALPAK**

**VP/USPS-T1-5.**

Your testimony at p. 13, ll. 18-20, states:

It should be emphasized that postal management is not pursuing the RAO Initiative in order to achieve any predetermined operating cost savings target in the postal retail network.

In light of your discussion about the Postal Service's financial condition discussed at p. 13, ll. 7-9 and trends (e.g., increased use of alternative access for retail postal transactions) discussed at pp. 3-6, please explain why the Postal Service is not seeking a far higher reduction (e.g., \$1 billion) in the cost of retail at this time.

**RESPONSE:**

- a. That discussion only acknowledges the financial environment in which the RAO Initiative happens to be pursued. Retail optimization is an ongoing obligation irrespective of the financial state of the Postal Service at any given time. The RAO Initiative is not being pursued to achieve some financial savings target. It is, nevertheless, expected to result in some cost savings.

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**VP/USPS-T1-6.**

Please refer to USPS-T-1, p. 15, ll. 1-4, where you discuss 2,800 low workload offices.

- a. If the Postal Service maintains data indicating the total number of square feet of lobby space available to customers at each of these 2,800 offices, in how many facilities have lobby space available to customers of 100 square feet or less?
- b. For those facilities with very small lobby spaces, could the post office lobby realistically be considered a community meeting space?
- c. For those facilities which are open for only two hours per day, could be the post office lobby realistically be a community meeting space?

**RESPONSE:**

- a-c. The generally small size of lobbies and dearth of operating hours would make the conduct of a community meeting quite difficult.

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**VP/USPS-T1-8.**

The Postal Service has a number of mobile retail vans, staffed by qualified Postal Service employees, capable of providing a number of retail services, including authoritative advice about mailing requirements and regulations. See, for instance, Docket No. N2009-1, Initial Brief of Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc, pp. 22-24, and references therein. Currently, use of these mobile vans appears to be chiefly in urban areas. When considering alternate access as part of its RAO Initiative, please discuss the extent to which the Postal Service considered replacing brick-and-mortar facilities with a mobile retail van in rural areas to serve a number of small communities on a regular basis, *e.g.*, two hours a day on a schedule ranging from two-days-a-week to five-days-a-week.

**RESPONSE:**

- a. The Postal Service does not regard that as a viable option.

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**VP/USPS-T1-11.**

Your testimony, USPS-T-1, at p. 9, ll. 3-4, refers to “the 2006 Congressional mandate to expand and market a variety of alternate retail access channels.” Please confirm you are referring to the note to codified 39 U.S.C. section 3691.

**RESPONSE:**

- a. Confirmed.